

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

ANGELA SWORD LEWIS
THOMAS K. LEWIS

Chapter 7
Case No. 11-44385-wsd
Hon. Walter Shapero

Debtors.

**TRUSTEE'S APPLICATION TO EMPLOY
OSIPOV BIGELMAN, P.C. AS COUNSEL FOR TRUSTEE**

NOW COMES Timothy J. Miller, the Chapter 7 Trustee of the Bankruptcy Estate of Angela Sword Lewis and Thomas K. Lewis, and moves this Court for entry of an Order Authorizing Employment of Counsel pursuant to B.R. 2014 and 11 U.S.C. §327.

IN SUPPORT of the application, the Trustee states:

1. Angela Sword Lewis and Thomas K. Lewis filed a voluntary petition under Chapter 7 of the Bankruptcy Code.
2. Timothy J. Miller is the duly appointed Chapter 7 Trustee in this case.
3. The Trustee wishes to employ the law firm of OSIPOV BIGELMAN, P.C., whose attorneys are duly admitted to practice in this Court.
4. The Trustee requires the advice and assistance of counsel for the following purposes:
 - (a) To give the Trustee legal advice with respect to his powers and duties;
 - (b) To prepare on behalf of the Trustee all necessary applications, answers, orders, reports and other legal papers;
 - (c) To conduct negotiations with unsecured creditors, secured creditors and taxing authorities;
 - (d) To pursue Chapter 5 causes of action; and
 - (e) To perform all other legal services for the Trustee as may be necessary herein.

5. OSIPOV BIGELMAN, P.C.'s Statement of Disinterestedness is attached hereto as **Exhibit B.**

6. The fees of OSIPOV BIGELMAN, P.C., at present are as follows:

Jeffrey H. Bigelman, Esq.	\$250.00/hour
Yuliy Osipov, Esq.	\$250.00/hour
Christopher F. Nelson, Esq.	\$195.00/hour
William C. Blasses, Esq.	\$195.00/hour
Paralegal	\$ 95.00/hour

Such fees are subject to change. All fees for legal services are subject to Court approval.

WHEREFORE, the Trustee requests that an Order be entered authorizing it to employ OSIPOV BIGELMAN, P.C. as his attorneys in this case. A proposed order is attached hereto as **Exhibit A.**

Respectfully submitted,

Dated: May 31, 2011

/s/ Timothy J. Miller
TIMOTHY J. MILLER (P36951)
Chapter 7 Trustee of the Bankruptcy Estate
645 Griswold, Suite 3900
Detroit, Michigan 48226
(313) 237-0850

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In re:

ANGELA SWORD LEWIS
THOMAS K. LEWIS

Chapter 7
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Debtors.

**ORDER AUTHORIZING EMPLOYMENT OF
OSIPOV BIGELMAN, P.C., AS COUNSEL FOR CHAPTER 7 TRUSTEE**

The Chapter 7 Trustee having filed his Application to Employ OSIPOV BIGELMAN, P.C., as Counsel for Trustee with attached affidavit and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that:

(A) OSIPOV BIGELMAN, P.C., is authorized to act as counsel for the Trustee in this case pursuant to the terms and conditions set forth in the Application and its supporting Affidavit;

(B) Compensation may be paid after application and after Court order authorizing payment.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
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_____ /

STATEMENT OF DISINTERESTEDNESS

STATE OF MICHIGAN)
) ss.
COUNTY OF OAKLAND)

JEFFREY H. BIGELMAN, being first duly sworn, states as follows:

1. I am employed by the Firm of OSIPOV BIGELMAN, P.C., whose offices are located at 20700 Civic Center Drive, Suite 310, Southfield, Michigan 48076 (the "Firm").
2. I am authorized to make this Affidavit on behalf of the Firm.
3. To the best of my information, knowledge and belief, neither I nor any member of the Firm represents or holds any interest adverse to the estate.
4. To the best of my information, knowledge and belief, neither I nor any member of the Firm has any connections with the Debtors, creditors, the Trustee, or any other party in interest, their respective known attorneys or accountants, the United States Trustee or any other person employed by the United States Trustee.

EXHIBIT B

5. I have been advised that the Debtors have numerous creditors and, accordingly, the Firm may have rendered services or had business associations with such creditors or their counsel in the ordinary course of the Firm's business, but none of these services have been in connection with, nor impact this proceeding.

6. The other members of the Firm and I are "disinterested persons" as such term is defined in 11 U.S.C. § 101(14) of the Bankruptcy Code.

7. The Firm has not made any agreement to share compensation in this case and affiant knows of no reason why the Firm should not act as attorneys for the Trustee.

OSIPOV BIGELMAN, P.C.

Dated: May 31, 2011

/s/ Jeffrey H. Bigelman
JEFFREY H. BIGELMAN (P61755)
20700 Civic Center Drive, Ste. 310
Southfield, MI 48076
Tel: (248) 663-1800
Fax: (248) 663-1801
Email: jhb_ecf@osbig.com

Subscribed and sworn to before
me this 31st day of May 2011

/S/ Tijuana Arnita Crawford
Tijuana Arnita Crawford
Notary Public, State of Michigan
County of Wayne
My commission expires: August 23, 2013
Acting in the County of Oakland